

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Debtors.¹

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**OMNIBUS CERTIFICATE OF NO OBJECTION WITH RESPECT TO THE PLAN
ADMINISTRATOR’S OBJECTIONS TO ADMINISTRATIVE CLAIMS ASSERTED BY
(I) OVERWATCH SURVEILLANCE LLC; (II) OVERWATCH ENTERPRISES LLC;
AND (III) OSTRAC CYBERSECURITY INC.**

[Related Docket Nos. 1110, 1111, 1112]

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “Complex Case Procedures”), the undersigned counsel for Tribolet Advisors LLC, as Plan Administrator (“Plan Administrator”) in the above-captioned bankruptcy cases, certifies as follows:

1. On April 28, 2023, the Plan Administrator filed the following claim objections (collectively, the “Claim Objections”):

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

- *Plan Administrator's Objection to Administrative Claims Asserted by Overwatch Surveillance LLC* [Docket No. 1110];
- *Plan Administrator's Objection to Administrative Claim Asserted by Overwatch Enterprises LLC* [Docket No. 1111]; and
- *Plan Administrator's Objection to Administrative Claim Asserted by Ostra Cybersecurity Inc.* [Docket No. 1112].

2. The deadline for parties to file responses to the relief requested in the Claim Objections was on June 2, 2023.² No responses have been filed or otherwise received by the Plan Administrator and the deadline for responding has passed.

3. The Plan Administrator requests that the Court sustain the Claim Objections and enter the attached proposed forms of orders at its earliest convenience.

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² Per the Certificates of Service appended to each of the Claim Objections, service of each of the Claim Objections was effectuated on April 28, 2023 by First Class Mail and electronic mail to each affected claimant. Pursuant to Federal Rule of Bankruptcy Procedure 9006(f), the Plan Administrator added three days to the prescribed period under Federal Rule of Bankruptcy Procedure 9006(a) for claimants to respond to the Claim Objections.

Dated: June 3, 2023

Respectfully submitted,

/s/ Charles R. Gibbs

Charles R. Gibbs

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Administrator*

Certificate of Service

I certify that on June 3, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Gibbs

Charles R. Gibbs